

Policies, Standard Operating Procedures, and General Orders

Chair(s)

Dannielle Hille
Rev. Michael Aaron Poindexter

Working Group Members

Hon. Dorcey Applyrs
Hon. Kelly Kimbrough
William T. Little, Esq.
Lillian Moy, Esq.
Nairobi Vives, Esq.

City of Albany Support Staff

Deputy Chief Edward Donohue
Jasmine A. Higgins

Introduction:

The Policies, SOPs, and GOs Working Group was tasked with reviewing APD's General Orders (formerly known as the Standard Operating Procedures SOPs) to provide recommendations to ensure policies are up-to-date, clear, consistent, and written in a way that eliminates the potential for racial bias, both implicit and explicit, with respect to the application of these policies. General Orders are the core mechanism that governs the conduct of each member of APD including the Chief of Police and informs the culture of public safety in the City of Albany. At the core of these General Orders are APD's philosophies and values. As a result, critically reviewing APD's General Orders, in the context of systemic racism and implicit bias, is essential and necessary in order to reform and reinvent APD. Until recently, APD's General Orders have been an internal document, available mainly to members of the Department. Consequently, community members lack knowledge and understanding about APD's policies further perpetuating a lack of transparency and trust.

GOALS:

The goal of the Working Group is to provide recommendations, that when implemented:

- a. Eliminate racial disparities in outcomes resulting from police/civilian interactions;
- b. Transform police culture from the warrior mentality to a guardian mentality;
- c. Ensure that there is a mechanism for community access to APD General Orders; *and*
- d. Ensure that APD General Orders are clear, concise and timely.

CHALLENGES:

During the Working Group's development of recommendations, it identified and discussed challenges in the broader context of (a) reviewing policies/general orders and (b) the adoption and implementation of the proposed recommendations.

A – Reviewing Policies/General Orders

- Extent of the General Orders. There were over 1,000 pages of general orders to review. The amount of the general orders combined with the language/police jargon used make the orders inaccessible to the general public.
- Need for significant clarification from sworn members has resulted in the need to speak with various officers at different levels of the APD

- Redactions complicate understanding and contribute to inaccessibility
- Understanding the intent of policies/general orders

B – Adoption and Implementation of the proposed recommendations

- The police union’s potential reluctance to accept the proposed reforms during contract negotiations
- The significant amount of time it takes to adopt changes to the General Orders. (ie: stop and frisk) The administrative capacity at APD has contributed to these delays.
- Implementing these recommendations will require interagency cooperation and partnerships to ensure effectiveness.
- Politics of policing reform. The process of policing reform as written by the Governor in NYS Executive Order 203 requires that the Mayor’s Office, the Albany Police Department, the Albany Common Council, and NYS all participate in the process. Requires participation from Executive branch and legislative branch as well as the Albany Police Department.
- Ensuring a mechanism for organization with respect to data collection and data retention
- Ensuring that updates to General Orders’ are communicated in a timely fashion

ASSETS

Assets include:

- APD leadership which seems committed to reinforcing its positives and changing its negatives.

RECOMMENDATIONS

I. Diversion Programs: G.O. 1.2.10 3 – Law Enforcement Assisted Diversion Programs

- a. The LEAD program is a law enforcement diversion program that aims at police officers utilizing their discretion to direct low-level offenders away from the criminal justice system and into services.

i. Recommendation(s):

1. There should be a public display of the funding streams for diversion programs, reporting requirements as to how the funds are utilized, the number of individuals given the opportunity to participate in diversion programs as opposed to incarceration.
2. A quarterly report should be made available to the public which provides information on the demographics of the individuals who are referred to diversion programs as an alternative to incarceration. Reported statistics should include at a minimum race.

II. Law Enforcement Assisted Diversion (LEAD): G.O. 1.2.20 IV - Procedures

- a. The policy states that upon contact, the arresting officer shall make a determination as to whether the individual is eligible for LEAD.
 - i. **Recommendation(s):**
 - 1. While the arresting officer should be permitted to make a recommendation for an offender to be considered for the LEAD program, the officer shouldn't be the sole determining factor.
 - 2. All arrests which do not fall into the category of ineligibility should be reviewed by administration to see if LEAD should be offered as opposed to the continuation of prosecution following an arrest
 - 3. Department administrator(s) should review all arrests and determine if any offenders should be considered for LEAD diversion programs.
 - 4. The department should employ a system of checks and balances to ensure that LEAD programs are not being withheld from offenders due to implicit bias.

III. Law Enforcement Assisted Diversion (LEAD): G.O. 1.2.20 - VII - Protocols

- a. Stakeholders such as police personnel and members of community organizations who provide the LEAD services are represented and vote on the acceptance or discontinuation of an offender into the LEAD program.
 - i. **Recommendation(s):**
 - 1. Include several community members who are not a part of the police department or service organizations who will be a part of the determination process.

IV. Use of Force –G.O 1.3.00 – II Authorized Use of Deadly Force

- a. In accordance with Article 35 of the New York State Penal Law, officers may use deadly physical force to prevent arson, escape, burglary, to prevent escape or attempted escape of someone in custody, or while resisting arrest during the commission of a felony.
 - i. **Recommendation(s):**
 - 1. The policy should provide more specific language for when the use of deadly force is authorized and explicitly prohibited.

V. Use of Force – Less Lethal Weapons: G.O. 1.3.00 – Chemical Agents – 3.c. Oleoresin Capsicum (OC) (aka Pepper Spray)

- a. G.O. lists the effects of pepper spray on humans and animals.
 - i. **Recommendation:**
 - 1. Restrict the use of tear gas in heavily populated/dense neighborhoods and look for safe and effective alternative measures which will allow for the efficient disbursement of unauthorized mass gatherings.

VI. Use of Force – Less Lethal Weapons: G.O. 1.3.05 – V. Use of Force Reporting Requirements. Use of Force Annual Analysis

- a. This general order lists the use of force reporting requirements to be completed whenever an officer take an action that results in the injury or death of a person, applies force through the use of a less lethal weapon, including display/deployment of a less lethal weapon, and when an officer applies weaponless physical force at a level written in the policy.
- b. Section F states that the Commander of OPS shall conduct a documented annual analysis of the department's use of force activities, policies, and practices and states that this report shall be made available to the Chief of Police.
 - i. **Recommendation:**
 1. The report should be made available to the general public annually.

VII. Disciplinary Procedures – G.O. 2.2.20

- a. The general order states that the Office of Professional Standards (OPS) is the final entity to receive officer disciplinary information.
 - i. **Recommendation(s):**
 1. Officer disciplinary information should also be given to the City's Corporation Counsel.
 2. Both OPS and the Corporation Counsel should consistently look for disciplinary patterns involving policing concerning the same officer.

VIII. CNA Audit Findings which are also included in our recommendations:

Recommendation 21.1: APD should consider revising General Order 1.3.00 Use of Force-Lethal Weapons with the following changes:

- a. Under Section I.A.1.a, "The suspect is acting or threatening to cause death or serious physical injury to the officer or others."
- b. Under Section I.A.1.a, "The suspect has the means or instrumentalities to injure an officer or others."
- c. Under Section I.A.1.a, "The suspect has the opportunity and ability to use the means of instrumentalities to cause death or serious physical injury."
- d. Under Section I.A.b.i, "Felony offense involving the infliction of serious physical injury or death."

Recommendation 23.1: APD should revise GO 1.3.00 and 1.3.05 to include a sanctity of life statement presented clearly under such a header at the beginning of the policy.

Recommendation 26.1: APD should assess each involved community member's mental status individually using current policy for making these assessments and note each separately in the use of force report.

Recommendation 29.1: APD should revisit its policy of requiring only a single use of force incident narrative submission and consider requiring each officer who used force during the incident to submit an independently generated narrative. Officers involved in the incident as witnesses should co-sign these narratives to indicate they reflect the incident accurately.

Recommendation 31.1: APD should incorporate community policing philosophy and associated principles explicitly into their Vision, Mission, and Core Values.

Recommendation 35.1: APD should ensure that GO 1.2.10 Diversion Programs and other SRO guidance are updated to reflect SRO's commitment to community policing, youth engagement, and recruiting...

Recommendation 38.1: APD officers should refer all individuals meeting the eligibility criteria and not falling in an exclusion category to LEAD.

Recommendation 52.1: APD should enforce required roll-call trainings after updates to General Orders, Special Order, and Training Bulletins to ensure that the mission behind the change is properly communicated to all officers in the department.

I. Office of Professional Standards: Duties and Responsibilities GO 2.4.00

- a. Duties and Responsibilities I.A. – Chain of Command should be updated to reflect current internal structure. OPS Commander reports to the Deputy Chief
- b. Duties and Responsibilities I.B.4. – Injuries should be clearly defined to ensure officers are noting all injuries no matter how minor they are perceived to be.
- c. Duties and Responsibilities I.B.8. – Review Functions of OPS should be clearly defined and should include the intervals in which these reviews will be conducted.
- d. Duties and Responsibilities I.D. – An officer who refuses to cooperate with OPS or knowingly gives false information during an investigation **shall** be subject to immediate suspension and may be terminated if warranted.
- e. Records, Maintenance and Security II.A.3. – OPS should be required to obtain as much demographic information about the complainant as possible, this includes but is not limited to gender, age, race and neighborhood. In the event that race is not known, they should record “white” and “non-white”. Including demographics of the complainant will allow for better data analysis to identify patterns.
- f. Annual Summaries and Public Availability III.A. – OPS must generate reports as per GO requirements. These reports are to be made publically available and should not simply be numbers but also include a written explanation of the data and definitions of any terms specific to OPS and policing. Once approved by the Chief, OPS should ensure it has been posted publicly on the department's webpage.

II. Office of Professional Standards: Complaint Procedures GO 2.4.05

- a. Complaints I.A. – GO should be updated to use language that reinforces the necessity for professional behavior while dealing with the public. While being a

police officer is difficult and there can be misunderstandings, these are not reasons for officers to treat the public in an unprofessional manner. The language used in this section minimizes the importance of attitude, language, compassion and de-escalation. Further officers should also take into account that citizens in need of their help may also be dealing with complicated pressures of their current situation.

- b. Complaints I.A.3.c. – Given the possibility of misunderstanding, following an investigation which fails to find wrongdoing on the part of the officer, the department should **NOT** seek any remedy for false allegations filed as a citizen's complaint.
- c. Complaints I.A.4. – Professional manner should be explained as it pertains to explaining the complaint process to citizens. This explanation should include that this should be done in a courteous, non-argumentative manner which is not defensive and does not question the validity of the complaint. This step is meant to inform the complainant not investigate the complaint.
- d. Complaints I.A.5. – It should not be the discretion of the supervisor as to which complaints are forwarded to OPS, **ALL** complaints received should be forwarded to OPS even in the cases that can be handled at the supervisory level. Complaints handled at the supervisory level should be noted with actions taken. All complaints should also be forwarded to the CPRB. This will ensure that in the event that a complaint rises to a level that should not have been handled at the supervisory level, it can be further investigated by OPS or CPRB.
- e. Complaints I.A.7. – ALL complainants should be offered a Citizens Complaint Form and informed they have the option to file their complaint using that form. No matter the disposition requested by the complainant, any complaint that includes a matter that warrants further investigation shall be sent to OPS using a Supervisory Inquiry Report
- f. Category of Findings/Conclusion of Facts III.A. – Definitions should be clarified for each type of finding to ensure consistent application of case classifications.
- g. Category of Findings/Conclusion of Facts III.A.6 – Currently cases classified as No Finding and not separated by sub-category. When entering a disposition of No Finding, cases should be marked with the sub-category so that patterns can be identified when looking at the data. It should also be noted that even in cases where the complainant is unavailable or the office is no longer employed by the City, cases continue until they are completed or go cold.
- h. Category of Findings/Conclusion of Facts III.B. – The department should create a clear data retention policy to ensure all data is maintained in the same manner for the required amount of time.
- i. Complaints GO 2.4.05 – As noted by the CAN Audit in Finding 12, officers are unclear about process and in Finding 18, the process is complicated. GO 2.4.05 is overly complicated, inconsistent and appears contradictory in several places. GO should be rewritten to ensure accountability and a smooth flow. All complaints should be processed through the same steps ending with OPS and CPRB. It shall

be OPS and CPRB's decision as to whether the complaint had been properly remedied. Consistency will help to ensure that all complaints are properly documented.

III. Office of Professional Standards: Inspections GO 2.4.10

- a. Policy – Inspections are housed under OPS but cover a wide range of inspections, most of which are not completed or overseen by OPS. Further the purpose of these inspections are to meet the community expectations but include no community input. Without community input the policies and inspection processes cannot be evaluated for its effectiveness at meeting community expectations.
- b. Line Inspection Procedures II – A minimum frequency of informal line inspections should be established with proper documentation in order to track if these inspections are being completed. Formal line inspections should be completed at minimum more frequently than biannually.
- c. Staff Inspection Procedure III. – Staff Inspections are not actually inspection of the staff, it is inspection of the facilities and function by OPS. The title of this inspection should be changed to **Facility Inspection**.
- d. Staff Inspection Procedure III.A.2. – Section must be rewritten to ensure OPS Commander can apply discipline. *Inspection team will report to the Commander of OPS, any violations of the rules, regulations or procedure, discovered through the inspection process that may warrant disciplinary action.*
- e. Staff Inspection Procedure III.C.1.a. – Staff (Facility) Inspections should be conducted at minimum more frequently than once every four (4) years.

IV. Personnel Early Warning System GO 2.4.15

- a. Definitions:
 - i. Performance Criteria – should be expanded to include officer issues such as tardiness, on the job injuries or suspected drug and/or alcohol use. Other incidents should be added such as DV, homicides, child sexual abuse or any other highly traumatic types of incidents officers may have to respond to.
 - ii. Threshold Matrix – should be compared to current best practices adjusted to ensure officers in need of assistance are identified early on and before a serious on the job incident occurs.
- b. Procedures II – Software: all efforts should be made to reduce paper which can be lost as it is not easily tracked. All staff using the available software “Blue Team” and “IAPro” should have proper training and there should be at least one super user who is able to use both the back and the front end of the database. The current procedures are complicated and pass through too many hands. They take things out of the computer to put it back into the computer. This entire procedure needs to be redesigned to ensure consistency and that no officer in need slips through the cracks because the paper got buried on someone's desk

V. Missing Persons GO 3.1.25

- a. Amber Alert Protocol II.V.C.2. – Standards should be created to ensure the supervisor handling the missing persons case applies the same reasoning when

determining if they “believe the child is in imminent danger of serious bodily harm or death...” to ensure they are not dismissing the danger based on bias such as the child’s race, living situation or neighborhood.

- b. In the event that the child does not meet the requirements for an Amber Alert, supervisor should still issue one of the available alerts for any person reported missing under the age of 18.

VI. Biased Motivated Incidents GO 3.1.60

a. Definitions:

- i. Biased incident: definition should explain “substantial part” as it refers to the amount of which the crime was committed based on the perpetrators bias. To ensure that hate crimes are properly documents as such the better alternative would be to remove “in whole or in substantial part” form the definition.
- b. Procedures: III.A.4. – Officers should report **ANY** crime in which a victim states they believe is a hate crime to their supervisor. Leaving it up to an officer’s perception could lead to the failure to document biased crimes as the officer may be unfamiliar with the culture or the imagery/words used.
- c. Procedures: III.A.8 – stronger language should be created to ensure officers who have never experienced hate crimes understand the trauma it causes to the victim and the community.

VII. Language Line GO 3.1.70

- a. Language Line Overview I.B. – Bullet B should be removed as the department no longer restricts use of the Language Line.
- b. Language must be added to ensure that officers utilize the Language Line **ANYTIME** it is evident or the officer suspects the complainant/victim is not properly understanding questions or information from the officer and vice versa. The City of Albany has very diverse communities and there are at least 54 languages spoken at the Albany High School. The Language Line is a vital tool ensure proper communication as well as easing tension and fear.
- c. Supervisors should be monitoring usage to ensure officers are utilizing the service.
- d. Language should be added to ensure officers are not using children in the household as translators. This behavior should be prohibited except in emergency situations that require police action that cannot be delayed by using Language Line. As soon as the immediate emergency situation is over, the officer should immediately switch to Language Line to complete the call for service.

I. GO 3.2.15 – Body Worn Cameras

a. Section I – General Information

i. Recommendations:

- 1.A subsection should be added ensuring that the BWCs are utilized in the most effective manner, to include utilization of all features and capabilities to the fullest extent and adoption of software updates.

2. APD should periodically consider whether its BWCs are outdated and whether replacement is necessary.
3. APD should delegate such decision-making and consideration to a specific unit or title and specify to whom such responsibilities have been delegated in the GOs.

b. Section I.E.3 – Supervisor Training Pertaining to Review of Recordings – This section specifies the review requirements for shift sergeants and shift lieutenants.

i. Recommendations:

1. Supervisor training on and usage of the BWC should be its own more robust section.
2. Adopt Recommendation 10.1 from the December 2020 CNA Racial Bias Audit Final Report which reads: [t]he supervisory review of BWC footage should be a randomized process in which the supervisors are given the exact videos they are to review.
3. Supervisors should be trained on the use of existing livestream capabilities and on all updates to the capabilities.
4. If it has not already done so, APD should acquire Axon's new 'Priority Ranked Video Audit' software which uses an algorithm to detect certain keywords (profanity, racial slurs, etc...) in BWC footage. Further, each shift supervisor should run a search of all BWC footage at the end of each shift for which such supervisor is responsible and if any keywords are detected, flag the video for further review.
5. The section should include clear direction on the procedure the supervisor must follow if the supervisor observes any conduct that is inconsistent with the GOs and/or requires discipline or corrective training as a result.

c. Section II.C – BWC Assignments – Detectives' use of BWC

i. Recommendations:

1. Adopt Recommendation 8.2 from the December 2020 CNA Racial Bias Audit which reads: APD should roll out BWCs in the detective unit as efficiently and expeditiously as possible.

d. Section III – Uses of the BWC

i. Recommendation:

1. Adopt Recommendation 9.1 from the December 2020 CAN Racial Bias Audit which reads: APD should clearly state in General Order 3.2.15 Body Worn Cameras how and when the Axon View should be used for live streaming purposes.

e. Section III.A.1 and .3 – The paragraphs use different terms to describe how and when an officer must activate its BWC, "without unnecessary delay" and "immediately" which do not necessarily mean the same thing.

i. Recommendation:

1. Change "without unnecessary delay" to "immediately" in Section III.A.1 for continuity.

- f. **Section III.B** – States: Once activated, the BWC shall record the entire incident until completion unless directed otherwise by a supervisor or is outlined in this policy.

i. **Recommendations:**

- 1.A supervisor that directs an officer to stop recording an incident, in part of whole, should document the direction and the reason for giving it.
- 2.A supervisor that directs should only direct an officer to stop recording an incident for a reason that is in accordance with GO 3.2.15.
- 3.If a supervisor directs an officer to stop recording an incident for a reason not in accordance with GO 3.2.15, such supervisor should be terminated.

- g. **Section III.C** – States: If an officer fails to activate the BWC, fails to record the entire event contact, or interrupts the recording, the officer will be required to document the reason on an Investigation Report.

It is unclear how anyone would know that the officer fails to document any such failure to record and also does not indicate what happens if such officer does document.

i. **Recommendations:**

- 1.Failure to document a failure to activate the BWC or an interruption in the recording should result in disciplinary action.
- 2.If an officer fails to activate the BWC or interrupts the recording for a reason not in accordance with GO 3.2.15, such officer will be terminated.

- h. **Section III.I** – Restricts use of BWCs

i. **Recommendations:**

- 1.Paragraph 1 which forbids the use of BWC to “deceitfully record other department personnel” should be rewritten as it may preclude an officer recording another officer’s misconduct. Given the recent event where an officer’s BWC recorded a conversation with another officer making racist remarks, APD should not discourage BWC use to capture remarks and actions.
- 2.Paragraph 7 which forbids the use of BWC for “other law enforcement meetings” should be explained because the intent and application is not clear.

- i. **Section VI.B** - File Storage and Retention

i. **Recommendation:**

- 1.APD should clearly state the retention schedule or include a reference to the APD retention schedule.

II. GO 3.3.00 – Department Vehicles

- a. **Section IV.D.1.a – Special Purpose Vehicles** - Includes armored vehicles for use by the Emergency Services Team

i. **Recommendations:**

1. APD should change the language from mandatory (shall) to permissive (may) and accurately reflect the current vehicle inventory.
2. APD should limit the extent which military-type vehicles are utilized by APD and develop MOUs with other police department's use when assisting APD in the City of Albany.

III. GO 3.3.10 – Mobile Digital/Audio Recording Equipment

a. Section III.A – Uses of the Mobile DVR

- i. APD should mandate that an officer use the Mobile DVR to record each time such officer uses the License Plate Reader. The officer should record the reason for using the License Plate Reader and the perceived race, gender and age of the operator of the vehicle.

b. Section III.B.1 – Restrictions on Use of Mobile DVR (DashCam)

i. Recommendation:

1. Paragraph 1 which forbids the use of the DashCam to “deceitfully record other department personnel” should be rewritten as it may preclude an officer recording another officer's misconduct. Given the recent event where an officer's BWC recorded a conversation with another officer making racist remarks, APD should not discourage DashCam use to capture remarks and actions.

c. Section VII – Review of DVR Data

i. Recommendations:

1. Supervisory Review should mirror that proposed for BWC footage review allowing for differences in software capabilities.
2. The media technician should also assess whether DVR technology is outdated and whether it should be replaced with newer or better technology and equipment.

IV. GO 3.3.30 – License Plate Reader Systems

a. Section III.C. – Proper Use During Traffic Stop

- i. An officer must record the use of and stated reason for the use of the License Plate Reader using the Mobile DVR each time the License Plate Reader is used even if it does not result in a traffic stop or arrest. The officer should state on the recording the perceived race, gender and age of the operator of the vehicle.

V. GO 3.4.05 Traffic Enforcement – Heavily Redacted Need Further Input From APD

a. Section III

i. Recommendations:

1. Adopt Recommendation 1.1 of the December 2020 CNA Racial Bias Audit.

I. GO 3.8.15 Orders of Protection & GO 3.8.20 Domestic Violence

- a. The General Orders relevant to youth under the age of 18 (raise the age) should conform to the law as described in the training bullets found at the following links: [Raise the Age Legislation Training Bulletin APD.pdf](#), [28239872.pdf](#)
- b. Under procedures 1A. Who are the partner agencies? List them and 2. Who is the designated liaison? Both should work with Equinox and CPS DV/CPS Project
- c. With respect to CPS - No policy or language in any of the general orders relating to primary aggressor. Does such a policy or language exist? What is the process for determining a primary aggressor? What tools or questions are utilized to determine the primary aggressor? How does the Albany Police Department handle the call when the “victim” is in fact the primary aggressor in a relationship?
- d. 1.B. The word techniques should be changed to best practices. Does the APD have a best practice for communication members who answer 911 calls for DV? What training do they receive? Is there any policy for how to answer DV calls, CPS calls and Sexual Assault calls?
- e. Add financial and verbal abuse to description of what DV is. Under section 3- the word "petty" petty offenses should be taken out. The language of petty offenses in a DV policy just doesn't seem right. The use of the word Offenses or crimes would be fine.
- f. D.2.- Should be a policy that they provide Equinox DV services info to the victims, assistance with transporting to a safe place (shelter, Equinox office or police department) should be asked additionally if the victim needs help with coordinating or transportation. Ask if the victim has a cell phone or if they need to make a phone call to a family member or friend quick.

Domestic Violence General Order No: 3.8.20

Section III. Domestic Violence Arrest Policy

Brief Summary: The language of “primary physical aggressor” within General Order No: 3.8.20 reflects that of Criminal procedure Law §140.10, but, in the interest of brevity, it leaves out key phrasing that should be highlighted rather than referenced. The proposed language better reflects that intended meaning of Criminal procedure Law §140.10:

Current Applicable Language (found at General Order No: 3.8.20 Section III, A3):

3. Where an officer has reasonable cause to believe that an individual has committed a misdemeanor, or has committed a petty offense in the officer's presence, the officer shall:

- a. Arrest the offender, unless the complainant requests otherwise.
- b. Additionally, when each individual has committed a misdemeanor, the officer shall attempt to identify and arrest the primary physical aggressor, pursuant to Section 140.10 of the Criminal Procedure Law.

- c. Officers shall not ask the complainant whether they seek the arrest of the offender. Officers shall only advise the complainant of the available options. Should an arrest be affected, a sworn statement or deposition should be taken from the complainant.

Breakdown of Proposed Changes to General Order No: 3.8.20 Section III, A3:

Proposed additions are highlighted, proposed deletions are in brackets

3. Where an officer has reasonable cause to believe that an individual has committed a misdemeanor, or has committed a petty offense in the officer's presence, the officer shall:

- a. Arrest the offender, unless the complainant requests otherwise.

- b. Additionally, when [each individual] **the officer has reasonable cause to believe that more than one individual** has committed a misdemeanor, the officer shall attempt to identify and arrest the primary physical aggressor, pursuant to Section 140.10 of the Criminal Procedure Law, **which requires consideration of the following factors:**

- i. the comparative extent of any injuries inflicted by the parties;
- ii. whether any party has made threats of future harm;
- iii. whether any party has a prior history of domestic violence;
- iv. whether any party acted defensively

- c. Officers shall not ask the complainant whether they seek the arrest of the offender. Officers shall only advise the complainant of the available options. Should an arrest be affected, a sworn statement or deposition should be taken from the complainant.

References

Criminal procedure Law §140.10 Section 4 Subsection c:

4. Notwithstanding any other provisions of this section, a police officer shall arrest a person, and shall not attempt to reconcile the parties or mediate, where such officer has reasonable cause to believe that:

(c) a misdemeanor constituting a family offense, as described in subdivision one of section 530.11 of this chapter and section eight hundred twelve of the family court act, has been committed by such person against such family or household member, unless the victim requests otherwise. The officer shall neither inquire as to whether the victim seeks an arrest of such person nor threaten the arrest of any person for the purpose of discouraging requests for police intervention. Notwithstanding the foregoing, when an officer has reasonable cause to believe that more than one family or household member has committed such a misdemeanor, the officer is not required to arrest each such person. In such circumstances, the officer shall attempt to identify and arrest the primary physical aggressor after considering:

- (i) the comparative extent of any injuries inflicted by and between the parties;
- (ii) whether any such person is threatening or has threatened future harm against another party or another family or household member;

- (iii) whether any such person has a prior history of domestic violence that the officer can reasonably ascertain; and
- (iv) whether any such person acted defensively to protect himself or herself from injury.

The officer shall evaluate each complaint separately to determine who is the primary physical aggressor and shall not base the decision to arrest or not to arrest on the willingness of a person to testify or otherwise participate in a judicial proceeding.

The protected party in whose favor the order of protection or temporary order of protection is issued may not be held to violate an order issued in his or her favor nor may such protected party be arrested for violating such order.

Nothing contained in this subdivision shall be deemed to (a) require the arrest of any person when the officer reasonably believes the person's conduct is justifiable under article thirty-five of title C of the penal law; or (b) restrict or impair the authority of any municipality, political subdivision, or the division of state police from promulgating rules, regulations and policies requiring the arrest of persons in additional circumstances where domestic violence has allegedly occurred.

No cause of action for damages shall arise in favor of any person by reason of any arrest made by a police officer pursuant to this subdivision, except as provided in sections seventeen and eighteen of the public officers law and sections fifty-k, fifty-l, fifty-m and fifty-n of the general municipal law, as appropriate.

References continued:

General Order No: 3.8.20

https://opdv.ny.gov/professionals/criminal_justice/primaryphysaggres.html

II. GO NO.3.9.05 Pg. 2 Pre-Planned/High Risk Situations

- a. It is the policy of APD to utilize the services of specialized units during pre-planned events and high risk incidents. APD will plan and coordinate activities related to pre-planned events and high risk situations in order to provide the community with the highest standards of safety and security. In order to provide community with the highest standards of safety and security, the following specialized units/ personnel may be utilized during pre-planned events or high risk situations. In accordance with current department directives
- b. Currently the policy list various units/personnel that may be used during high risk situations. This list includes CMT (Crisis Management Team). High risk situations includes individuals who are emotionally disturbed. Stronger language is needed for high risk situations that involve an emotionally disturbed person. It

is well documented that police officers are not adequately equipped to handle incidents in which emotionally disturbed persons are involved.

- c. For high risk situations, such as incidents involving emotionally disturbed persons, the policy should be revised to clearly indicate which services **will** be used. For example, in the event of a high risk situation, involving emotionally disturbed individuals, CMT (write out abbreviation) will be used. Non-sworn members of the department, such as social workers and mental health specialist should be hired to assist APD with responding to such incidents involving emotionally disturbed persons.

III. GO NO.3.9.05 Pg. 6 Pre-Planned/High Risk Situations

- a. Officers responding to a potential high risk situation will approach the area with caution. If it is believed that the officer is in direct danger or that his/her presence would endanger civilians, he/she should...
- b. The language that completes this sentence is redacted. It is critical to have clear guidance on what officers should do if they respond to a high risk situation and feel that they are in danger or the civilians present are in danger. It is also important to be transparent with the public about what APD's protocols are in the event officers are involved in high risk situations and feel in danger. In the context of racial disparities, it is believed that officers react differently when they encounter a Black civilian versus a White civilian and perceptions of danger vary based on the skin color of the civilian. These varied perceptions are believed to be responsible for higher rates of use of force and lethal force among Black civilians
- c. Modify this policy to Include clear language that specifies what officers responding to a potential high risk situation should do.

IV. GO NO.3.9.05 Pg. 9 Pre-Planned/High Risk Situations

- a. Active Shooter/ Active Threat: Officers who are responding to an active shooter incident will respond priority one. Prior to arriving at an active shooter event officers...The majority of this section is redacted.
- b. Language must be included to complete the policy and provide officers with clear instruction on what to do in the event of an encounter with an active shooter/active threat.

V. GO NO 3.9.05 Pg. 17 Pre-planned/High Risk Situations

- a. APD has a clear explanation of the difference between protests and civil disturbances and demonstrates a strong emphasis on connecting with leaders of groups planning these events. The policy is missing steps that if implemented it could help to ensure that protests and civil disturbances remain peaceful.
- b. APD should add language to General Order 3.9.05 Pre-planned/High Risk Situations section IV.C.2.a that personnel shall attempt to ascertain the identity of leaders of the protests or civil disturbances. APD should add language to General Order 3.9.05 section IV.C.2.a that states, "Supervisor shall attempt to open lines of communication with the leader of the group to ensure it remains a peaceful protest."

VI. GO NO 3.9.15 Pg. 45 Emergency Services Team

- a. The only chemical agents that are used by the Albany Police Department are...

- i. The chemical agents used by APD is redacted in this section. Also, in other sections of the GOs APD's current policies allow for the use of orthochlorobenzal malononitrile (CS gas) in response to unlawful assembly and for the purposes of crowd dispersal, with approval from the incident commander overseeing response, after an audible warning of intended use, and with Emergency Medical Services on-site
 1. APD should review and revise their policy on the use of CS gas in response to unlawful assembly and for crowd dispersal purposes to align with emerging recommended practices regarding maintaining community trust during protest events. At a minimum, APD should expand this section of policy to clearly enumerate the specific circumstances in which CS gas can or cannot be used for these purposes.
 2. 2. APD should ensure that all officers and incidents are compliant with current policy regarding the use of CS gas, particularly related to required notification, presence of Emergency Medical Services, and disposal of expired CS gas canisters.
 3. 3. APD should clarify which chemical agent is being used

VII. GO NO.3.9.15 Pg. 48 Emergency Services Team

- a. It is the purpose of this policy to establish guidelines for the use of chemical agents to effectively deal with Civil Disturbance/Protest. The only chemical agents that are used by APD are...
- b. The chemical agents used by APD is redacted in this section. Also, in other sections of the GOs APD's current policies allow for the use of orthochlorobenzal malononitrile (CS gas) in response to unlawful assembly and for the purposes of crowd dispersal, with approval from the incident commander overseeing response, after an audible warning of intended use, and with Emergency Medical Services on-site
 - i. APD should review and revise their policy on the use of CS gas in response to unlawful assembly and for crowd dispersal purposes to align with emerging recommended practices regarding maintaining community trust during protest events. At a minimum, APD should expand this section of policy to clearly enumerate the specific circumstances in which CS gas can or cannot be used for these purposes.
 - ii. APD should ensure that all officers and incidents are compliant with current policy regarding the use of CS gas, particularly related to required notification, presence of Emergency Medical Services, and disposal of expired CS gas canisters.

VIII. GO NO.3.9.15 Pg. 49 Emergency Services Team

- a. Only the amount of chemical agent that is reasonable shall be used.
- b. This policy lacks specificity. This policy should be revised to clarify what is meant by "reasonable."

IX. GO No.3.9.15 pg. 16 Special Operations: Emergency Services Team

- a. In addition, pursuant with the New York State Division of Criminal Justice Services (DCJS) "SWAT In-Service Course" The Emergency Services Team will ensure that the following minimum topics are instructed throughout the training year, and that all filling requirements for DCJS are met:
 - i. The training topic list lists does not include training on de-escalating situations, crisis intervention and Bias/Diversity.
 - ii. The Emergency Services Team should be trained in De-escalation, Crisis Intervention and Bias/Diversity.

X. GO NO.3.9.20 Pg. 9 Patrol Rifle/Team/Operators

- a. All patrol rifle operators will follow G.O.1.3.0.5-Use of Force-Lethal Weapons in regards to deployment and use of force. This policy references APD's use of force policy. APD's policies on use of force do not currently include an explicit sanctity of life statement.
- b. APD should revise GO 1.3.00 Use of Force – Less Lethal Weapons and 1.3.05 Use of Force – Lethal Weapons to include a sanctity of life statement presented clearly under such a header at the beginning of the policy. Additionally, every GO that references the Use of Force-Lethal Weapons policy should explicitly state the sanctity of life statement.

XI. GO NO.3.9.20 Pg.7 Patrol Rifle/Team/Operators

- a. The success of the Patrol Rifle Team and a patrol rifle operator is firmly rooted in the training that the patrol rifle operator attends.
- b. The policy does not list the trainings required for members of the Patrol Rifle Team.
 - i. A list of trainings offered to the Patrol Rifle Team should be included in the GOs as it is included in the Emergency Services Team section of the GOs.
 - ii. 2. The Patrol Rifle Team should be trained in De-escalation, Crisis Intervention and Bias/Diversity.

I. Records Administration: G.O. 4.2.00.I – Privacy and Security of Records

- a. The Albany Police Department experienced a data loss of its internal databases for the year 2018. APD internal databases maintain sensitive confidential data such as Domestic Incident Reports, Arrests, Arrests Disposition Information, Accident Reports and Juvenile Arrest records. Based on City of Albany Personnel, since the data loss, the City of Albany and APD have taken significant steps to protect against future similar occurrences. As losses in data may contribute to a level of mistrust by the community it is recommended that the City of Albany and APD continue to implement measures to protect data and the confidential information stored in APD's internal databases.

II. Records Administration: G.O. 4.2.00-I.B.4 – Non-Accessible Records

- a. This General Order categorizes personnel records as non-accessible records. APD should update this General Order to provide for recent changes in the law including the repeal of Civil Rights Law §50-a that prohibited disclosure of personnel records.
- b. To promote transparency and increase public confidence in the integrity of the police department, APD should outline the records available in each personnel file with a brief description published in the General Orders, FOIL guidance and on the APD website to the extent this recommendation does not conflict with any other agreement.

III. Records Administration: G.O. 4.2.00-I.B.5 – Calls for Service

- a. The CNA Racial Bias Audit recommended that APD improve data collection that would allow for an independent audit to detect the presence or absence of implicit bias or systemic racism in policing. On or about June 2020, the Albany Common Council amended Article I, Part 1, of Chapter 42 of the Code of the City of Albany to include Section 42-5.1 entitled, “Police Department Statistics”. Section 42-5.1.A-2 requires that APD develop a form in consultation with CPRB to record and retain data such as the race, color, ethnicity, gender, and age.
- b. As the goal of the collaborative is to identify and eliminate biases in policing to the extent practicable, the General Order should require that the data collected in the record for calls for service include at a minimum the data required in Local Law 42-5.1.A-2.
- c. In addition, to the extent practicable and available to APD, revise the General Order to require that the record for calls for service collect data on the (a) the length of the interaction, (b) information detailing the reasons for such call within G.O. 4.2.00-I.5 and (c) geographical data (latitude/longitude of location) or other information that would assist in future audits.
- d. Per the Racial Bias Audit, the Collaborative Recommends that APD review and assess the categories contained in the record for Calls for Service and investigate the overuse and/or misuse of the “other” category. As transparency is a major concern for the Collaborative and the citizens of the City of Albany, use of the “other” category should be used sparingly and when the call for service does not fall within another category. APD should periodically review the records for calls for service to ensure that incidents are properly categorized, accurate and relevant.

IV. Records Administration: G.O. 4.2.00-I.B.7 – Freedom of Information Law (FOIL)

- a. Require APD to update this General Order to include disclosure of Personnel records following the repeal of Civil Rights Law 50-a. To promote transparency APD should post online information about disciplinary actions taken against officers that would be subject to disclosure under FOIL.

V. Records Administration: G.O. 4.2.00-V – Records Maintenance

- a. Require APD to provide notice of a change, modification or revision to a report form or procedure to members of the Department within 10-days of the effective date. Over the course of the Collaborative's investigation members of APD were not aware of revisions to policies, procedures or forms in a timely manner.

VI. Field Reporting and Management: G.O. 4.2.05

- a. The City of Albany Police Department uses reporting forms, which comply with the standards set by New York State, along with other papers, parking tags, uniform traffic tickets, accident reports, etc., as required. However, on or about June 2020, the Albany Common Council amended the local law as outlined above requiring certain data be collected on a form created by the APD and CPRB. This General Order should be revised to reflect the amendment to Local Law 42-5.1.A-2 and requirements set forth within.

VII. Record Systems: G.O. 4.2.10.II.A – Records Management and Computer Systems

- a. The Record for each call of service should include recommendations set forth above in Section III.

VIII. Record Systems: G.O. No.: 4.2.10.VI.C – Information of Arrest History

- a. APD maintains information in relation to the arrest history of individuals. APD utilizes the standard New York State Arrest Report (DCJS 3204). According to discussions with APD, race data is collected during arrests.
- b. APD must update General Orders to reflect the collection of race data in arrest paperwork. Further, APD should reference Local Law Section 42-5.1.A and determine if all paperwork, forms and/or reports used during the course of the arrest complies with the law.

IX. General Management and Administration: G.O. No.: 4.2.15 – Administrative Reporting Program

- a. It is the policy of APD to create administrative reports to keep the Chief of Police and organizational components informed of all aspects of department operations including daily, weekly, monthly, annually and multi-year reports to track and reduce crime.
- b. To increase accountability and detect trends that may indicate the existence of systemic and institutional racism and discrimination, the Chief of Police and an outside organization such as the Citizens Police Review Board (CPRB) or Center for Law and Justice, should receive monthly and annual reports of APD stops, arrests, records for calls for service, searches, and traffic stops highlighting the racial and geographical data available.
- c. **4.2.15.II.B** – Require APD to notify employees of newly created or updated forms within 10-days of approval by the Chief of Police.

X. Law Enforcement Role and Authority: G.O. No.: 5.1.00 (SEARCH AND SEIZURE)

- a. Under both the United States and New York State Constitutions all persons are protected from unreasonable searches and seizures. These basic rights protect personal privacy and our right to be free from unreasonable government intrusion of our persons, homes, businesses, and property.

We hold these rights to be one of the most important. Searches and seizures occur daily throughout the country and here in the City of Albany, therefore it is important to frequently review and update this General Order to keep current and compliant with the fluidity of legal precedent.

- b. APD should review and update this General Order quarterly and notify its Personnel of changes to the General Order within a reasonable period of time. APD should also review all of the General Orders for administrative errors that may confuse citizens seeking to review the General Orders.
 - i. General Order 5.1.00 has an effective and revision date of January 19, 2016 with an Issue Date of October 23, 2017 issued by Albany Police Chief Eric Hawkins.
- c. 5.1.00.IV – Require APD to update this General Order to clarify the reference to stop and frisk as an exception to Searches Without A Warrant. Constitutional challenges to stop and frisk have shown overwhelming evidence that the policy is used as a method of racial profiling and harassment of communities of color. Clarifying the Terry Stop v. NYC Stop and Frisk would assist the public who may review this policy and assume APD authorizes the use of the latter.
- d. Require that APD officers execute a search warrant only after providing audible notice of the authority and purpose prior to the execution of the warrant, except in the limited circumstances where a no-knock warrant is authorized. Audible notice of authority and purpose should be exercised in good faith to provide actual notice to the occupant.
- e. Revise the General Order to require that Search Warrants be executed during the day unless good cause is shown to a court. APD's current GO, adopts CPL 690.35 permitting execution of search warrants between 6:00 AM and 9:00 PM. While it will take an act of the Legislature to repeal/amend Criminal Procedure Law 690.35 or action by the Common Council, APD can proactively take steps to reduce unintended tragedies like Breonna Taylor.
- f. Require APD officers to turn on body worn cameras (BWC's) when executing a search with or without a warrant of a residence. APD should require members to turn on the camera at least 3-5 minutes before the warrant is served and executed through 3-5 minutes after. The BWC must be turned on prior to the officer providing "Audible Notice of the authority and purpose". Periods of time wherein

the BWC is turned off whether by sound or video must be explained and accounted for. BWC videos should be reviewed periodically for compliance.

- g. 5.1.00.III.3.D.6 – No-knock violate citizens constitutional rights, unnecessary risk of injury or death, and are used disproportionately against people of color. As we have recently seen, use of no-knock warrants can cause an innocent citizen or suspect who might have acted calmly to a knock and announce, to initiate sometimes unknowingly, a confrontation with police.
- h. 5.1.00.III.6 – APD should revise the General Order as a best practice to restrict the use of no-knock warrants when executing search warrants of residences to circumstances only when (a) APD has a reasonable suspicion that knocking and announcing their presence, under the particular circumstances, would endanger the life and safety of the executing officer or another person, or (b) when searching for and arresting a person who is the subject of a warrant for a felony, is likely to commit another felony, or may endanger the life or safety of the executing officer or another person. While it will take an act of the Legislature to repeal/amend Criminal Procedure Law 690.35 – (4b) or action by the Common Council, APD can proactively reduce the use of no-knock warrants by its officers by revising the General Orders. **Current GO is redacted precluding the Collaborative from reviewing GO's in its entirety. However, it is presumed that the current GO mirrors language in CPL 690.35 including factors when applications for no-knock warrants can be utilized. This recommendation further limits the exceptions contained in CPL 690.35(4)(b).
- i. APD should amend the General Order 5.1.00.III.B & D to increase the scrutiny surrounding the application and need for a no-knock warrant and provide a system of checks and balances for approval of no-knock warrants. APD should revise the General Order to include language that “An officer requiring a no-knock warrant **must** (delete “should”) consult with a detective supervisor **AND** the District Attorney's Office before proceeding with a no-knock application.
- j. Per APD Personnel, training to prepare search warrant applications are conducted at the Detective Office and through DCJS. The General Order should be revised to include any additional training requirements for search warrants as set out in the Collaborative's training recommendations.
- k. APD should revise the General Order and all necessary forms to collect race data on the use of no-knock warrants by its executing officers and/or detectives who grants approval. This data should be compiled in a report and readily available to the Chief of Police annually. This data should be compiled and made available by the Warrant Control Officer as determined by further recommendations of the Collaborative, Audit, or Local, State or Federal Law.
- l. 5.1.00.III - APD should revise the General Orders to include safeguards to ensure that the address, recipient and property that is the subject of the search warrant is accurate and based on reliable and current information both prior to issuance of the warrant and prior to execution. The current order provides for certain safeguards, however, given recent events, and the grave constitutional concerns

with searches, the Collaborative recommends that the information be scrutinized from inception to processing the evidence. While the validity of search warrants are challenged in court, the constitutional violations of the citizens and friction between police relations cannot be erased by suppression of evidence.

XI. Alternatives to Arrest: G.O. No.: 5.1.15

- a. The CNA Racial Bias Audit of the Albany, New York Police Department discovered that “APD’s philosophy and culture have a strong focus on community policing practices, but this message needs to be reinforced to all personnel.” The discretion to use alternatives to arrest is a significant tool to reinforce APD’s commitment to community policing and the 21st Century Policing Model.
- b. APD should work with the Common Council and schools to implement procedural justice programs as an alternative to arrest. APD should include similar programs as an alternative to arrest or referral source in General Order 5.1.15. III (Alternatives to Arrest) to reinforce its commitment to its personnel. Further, the use of procedural justice programs builds trust and legitimacy in the process of policing and should be reiterated in the General Order.
- c. Under Section II. Guidelines for Exercising Discretion, the General Orders should be revised to include language that encourages officers to consider APD’s commitment to the philosophy and culture of community policing when exercising discretion to arrest.
 - i. Consistent and proper use of discretion, based on professional policing competence, will do much to (*project to the public APD’s commitment to community policing,*) preserve good relationships and retain confidence of the public.
- d. APD should revise the General Order to prohibit personnel from engaging in discrimination and bias-based policing when deciding to use an alternative to arrest. The GO should prohibit the use of race, ethnicity, gender, gender identity, sexual orientation, religion, economic status, age or cultural group as a criteria for determining if/what use of an alternative to arrest.
- e. APD should include language within the General Order that encourages its personnel to use the SARA policing problem solving model as part of personnel’s engagement with the community and exercise of discretion.
 - i. Scanning
 - ii. Analysis
 - iii. Response
 - iv. Assessment

XII. Bias Free Policing – General Order No: 5.1.20

- a. Public trust is tantamount to the success of community policing and a core pillar of the 21st Century Policing Model. Trust building through impartial policing should be emphasized and prevalent in the General Orders. Therefore, APD should include language in the General Order that “Fair and Bias free policing

promotes trust within the community and enhances legitimate law enforcement efforts.” APD should include language reflecting its commitment to the philosophies outlined in the 21st Century Policing Model that would reiterate its commitment to meaningful police reform.

- b. APD should re-word this General Order to simplify the language and depart from legalese to the extent possible.
- c. APD should clarify the “Purpose” section of the General Order to include a separate sentence that states “*Bias-based policing is prohibited both in enforcement of the law and delivery of police services.*”
- d. APD should require personnel to intervene and encourage witnesses or others aware of instances of biased policing to report the incident to a supervisor or the Chief of Police and include such language in the General Order.
- e. APD should revise the General Order to ensure that those who report instances of biased policing are aware that they will not be subject to retaliation.
- f. On November 1, 2020, an APD officer made racist statements while on duty with an Albany County Sheriff’s Officer. The racist statements were captured on an officer’s BWC, flagged and reported to APD Department of Professional Standards. APD should utilize existing accountability mechanisms, such as personnel evaluations, in-car or body-worn cameras (BWC), early intervention systems, and complaint review to promote fair and bias-free policing and to measure APD progress.

XIII. Central Booking: Strip/Body Cavity Search – General Order 5.2.25

- a. APD should include language in the General Order that reasonable suspicion to conduct a strip search or body cavity search may not be based on race, ethnicity, gender, gender identity, sexual orientation, religion, economic status, age or cultural group.
- b. APD General Order 5.2.25.II.G delineates the minimum data required to be reported on the Albany Police Department Strip Search Report. This Order should be revised to require the collection of data necessary to ascertain if racial disparities exist in the performance of strip/body cavity searches by APD. The Order should require the Central Booking Supervisor responsible for authorizing the search to keep records and be familiar with APD’s policies on bias-free policing.

XIV. Central Booking: Prisoner Processing – General Order 5.2.20

- a. Section II.B should include reference to the discretion permitted to personnel to use an alternative to arrest as outlined in GO 5.15.
- b. Section III should contain information to reinforce APD’s practice and commitment to community policing, the sanctity and preservation of life, human rights, and the dignity of every person during the arrest and booking process.
- c. APD should emphasize in the General Order the Use of Force techniques such as de-escalation, community understanding and education, and guardian versus

warrior mentality. Both current and retired APD officers reported to the collaborative that establishing sound relationships with the community, coupled with education and empathy, resulted in a reduced likelihood of use of force during police interactions. It also created a pipeline of information from the community to that particular officer.

Additional Recommendations & Strategies:

- Periodic public meetings to be convened by the Mayor to report on the status of the implementation of recommendations;
- Continuous advocacy efforts to initiate or support legislative/policy changes at the state and county government level which are necessary precursors to implement reforms at the local government level;
- Coalition building with leadership in neighboring municipalities to attain regional continuity in policing;
- Creation of a strategy to ensure adoption of recommended edits to the GOs and targeted training for APD officers.
- Create a non-sworn compliance officer (included in Racial Bias Audit use footnote)
- Consistent documentation of police noncompliance of general orders and misconduct. Must be public facing.
- Ongoing APD participation in local, county, and state coalitions and task forces. e.g. domestic violence victims, trans victims, youth below the age of 18, BIPOCs.
- Adopt recommended edits to the GOs governing serving victims of domestic violence, including guidance on identifying the primary aggressor
- Targeted training for APD officers on why it can take a long time for domestic violence victims to leave, on services to trans DV victims, and on primary aggressor theory.
- Quarterly virtual focus group meetings open to the community (could be divided by neighborhood but perhaps not necessary if virtual).
- Continue to make virtual contact available post-pandemic.
- Add a “What’s New” section to the APD website section on SOPs and GOs. This would be where the APD could highlight updates to the general orders and any other changes to this section of the website.
- An APD Compliance Officer to ensure timely data collection, reporting and review of APD actions
- Closer interaction between advocacy and community groups for certain populations (strategy)
- APD Rights of Victims of Family Offense sheet must be updated
- Equinox DV Services info is out of date and must be updated
- APD Safety Tips for OVS Sheet must be updated
- Policy or language related to elder abuse. Equinox has an Elder Abuse case manager who can be contacted for any elder abuse cases.
- Special considerations for LGBTQ victims of DV – APD to provide information for In Our Own Voices and Equinox
- Any individual who visits an APD station to report domestic violence, sexual assault, child sexual abuse, human trafficking, and/or labor trafficking should be able to sit down in private with an officer away from general areas or waiting rooms.

Appendix

DRAFT